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CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM HOLMES, and  
DEMON CARTER,

Defendants.

) INDICTMENT  
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CASE NO.

1 17 CR 243  
Title 18, Sections 1951(a),  
924(c), and 2, United States  
Code

1 17 CR 243

GENERAL ALLEGATIONS

JUDGE OLIVER

1. At all times material to this Indictment, Dollar Tree had stores located at 12900 Miles Road, Cleveland, Ohio, and 2892 E. 116th Street, Cleveland, Ohio. Said stores were engaged in the retail sale of articles and commodities that had moved in interstate commerce, to include clothing, food, and other merchandise.
2. At all times material to this Indictment, said Dollar Tree stores were owned and operated by Dollar Tree, Inc., which had its headquarters in Chesapeake, Virginia.

COUNT 1

The Grand Jury charges:

3. Between on or about May 14, 2016, and on or about June 4, 2016, in the Northern District of Ohio, Eastern Division, defendants, WILLIAM HOLMES and DEMON CARTER, did knowingly, willfully, and unlawfully conspire and agree with each other and other persons unknown to the Grand Jury to unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants, WILLIAM HOLMES and DEMON CARTER, and others unknown to the Grand Jury did unlawfully take and obtain, and attempt to take and obtain monies in the custody, possession, and presence of employees of Dollar Tree located at 12900 Miles Road, Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendant, WILLIAM HOLMES, and others unknown to the Grand Jury displayed and brandished firearms in the presence of said employees, in violation of Title 18, United States Code, Section 1951(a).

COUNT 2

The Grand Jury further charges:

4. On or about May 14, 2016, in the Northern District of Ohio, Eastern Division, defendants, WILLIAM HOLMES and DEMON CARTER, and a person unknown to the Grand Jury, aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants, WILLIAM HOLMES and DEMON

CARTER, and a person unknown to the Grand Jury, did unlawfully take and obtain monies in the custody, possession, and presence of Dollar Tree located at 12900 Miles Road, Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that a person unknown to the Grand Jury displayed and brandished a firearm in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 3

The Grand Jury further charges:

5. On or about June 4, 2016, in the Northern District of Ohio, Eastern Division, defendants, WILLIAM HOLMES and DEMON CARTER, aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants, WILLIAM HOLMES and DEMON CARTER, did unlawfully take and obtain monies in the custody, possession, and presence of employees of Dollar Tree located at 12900 Miles Road, Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendant, WILLIAM HOLMES, displayed and brandished a firearm in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 4

The Grand Jury further charges:

6. On or about June 4, 2016, in the Northern District of Ohio, Eastern Division, defendant, WILLIAM HOLMES, did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which said defendant may be prosecuted in a court of the United States, that is, Interference with Commerce by Means of Robbery, in violation of Title 18, United States Code, Section 1951(a), as charged in Count 3 of the Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 5

The Grand Jury further charges:

7. On or about June 19, 2016, in the Northern District of Ohio, Eastern Division, defendant, WILLIAM HOLMES, and other persons unknown to the Grand Jury, aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendant, WILLIAM HOLMES, and other persons unknown to the Grand Jury, did unlawfully take and obtain monies in the custody, possession, and presence of employees of Dollar Tree located at 2892 E. 116th Street, Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendant, WILLIAM HOLMES, and other persons unknown to the Grand Jury, displayed and brandished firearms in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 6

The Grand Jury further charges:

8. On or about June 19, 2016, in the Northern District of Ohio, Eastern Division, defendant, WILLIAM HOLMES, and others unknown to the Grand Jury, aiding and abetting one another, did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which said defendant may be prosecuted in a court of the United States, that is, Interference with Commerce by Means of Robbery, in violation of Title 18, United States Code, Section 1951(a), as charged in Count 5 of the Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A), and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.